

REMARKS

This amendment is responsive to the Office Action dated August 1, 2006. In the amendment, claims 2, 5, 6 and 14-21 have been canceled without prejudice, claims 1, 3, 4, 7 and 8 have been amended, and new claims 22-33 have been added such that claims 1, 3, 4, 7-13 and 22-33 remain pending in the application. Reconsideration of the pending claims in light of these amendments and the following remarks is respectfully requested.

These amendments add no new matter. Provision of the portable memory device having a display for displaying an image while the portable memory device is detached from a recorder/playback device is variously described throughout Applicant's specification as filed, including but not necessarily limited to block diagram FIGs. 2-4 and the related descriptions, illustrative diagrams FIGs. 6-7 and the related descriptions, and flow diagram FIG. 5 and the related description. Additional features such as an attachment area including a magnet for attachment to a metallic object (e.g., ¶0038 of published version of specification) and functional control of the recorder/playback device (e.g., ¶0054 of published version) are also described in Applicant's specification as filed.

Claims 1-10, 12, 14 and 21 have been rejected under 35 U.S.C. 102(e) as being anticipated by U.S. Pat. No. 6,757,479 to Niikawa ("Niikawa"). This rejection is traversed.

Claim 1 has been amended and now recites: *[a] method comprising:*

storing content on a portable memory device, said content including an image captured using a recorder/playback device;

detaching the portable memory device from the recorder/playback device; and

displaying the image on the portable memory device while the portable memory device is detached from the recorder/playback device.

These claimed features provide a portable memory device that not only provides the functionality typically associated with such devices (*i.e.*, storing digital content in a portable form factor), but also includes a display that allows a given piece of content such as an image to be displayed on the portable memory device.

These claimed features are absent from the relied upon references. Niikawa discloses an image display device that accommodates browsing through image files. The image display

device appears to be a dedicated apparatus for such browsing, and is not itself a portable memory device. Although Niikawa mentions a portable memory device 8, this is a conventional portable memory device and does not appear to be configured to include a display. The portable memory device 8 also is illustrated as being separate from the image display device 1. Thus, Niikawa merely appears to be an example of a conventional portable memory device 8 that may be inserted into another apparatus such as the image display device 1.

The portable memory device 8 of Niikawa clearly does not disclose or suggest *“displaying the image on the portable memory device while the portable memory device is detached from the recorder/playback device”* as claimed by Applicant. Instead, it appears to merely be a conventional portable memory card that does not have a display of any kind. Thus, it cannot be fairly said to even suggest the claimed subject matter.

Nor is it appropriate to construe the image display device 1 of Niikawa as Applicant’s claimed portable memory device. The image display device 1 of Niikawa is clearly a device configured for browsing through images. This device is not described as being portable, and is clearly a relatively large and complicated device that is neither portable nor in any way equivalent to a portable memory device, such as is claimed by Applicant.

Accordingly, Applicant respectfully submits that independent claim 1 is clearly neither disclosed nor suggested by Niikawa.

Dependent claims 3, 4, 7-13, 22 and 23 incorporate the features recited in independent claim 1 and thus are also neither disclosed nor suggested by Niikawa. Moreover, they separately recite features that are patentably distinct from the reference.

In particular, Applicant notes that new claims 22 and 23 are clearly neither disclosed nor suggested by Niikawa. Claim 22 recites *wherein the portable memory device displays functional controls for the recorder/playback device while the portable memory device is connected to the recorder/playback device, said functional controls including soft keys that are particular to the recorder/playback device*. There is no mention of any kind regarding such a feature in Niikawa.

Claim 23 recites *wherein the portable memory device is configured to include an attachment area, said attachment area including a magnet for attaching the portable memory device to a metallic object, such that the portable memory device displays the image while attached to the metallic object*. These features further highlight the clear distinctions between

Niikawa and Applicant's claimed invention. As mentioned, Applicant's claimed invention accommodates displaying the image on a portable memory device. These relatively small devices may be configured with a magnet for attaching the device to another object, such as a refrigerator. The image display device of Niikawa is not comparable to such a device, and there is clearly no suggestion in Niikawa of configuring the image display device in this fashion.

For reasons similar to those provided regarding the above-described method claims, device and system claims 24-33 are also neither disclosed nor suggested by Niikawa.

Accordingly, Applicant respectfully requests reconsideration and withdrawal of the rejection of the claims under 35 U.S.C. § 102(e) as being anticipated by Niikawa.

Claims 11 and 13 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over Niikawa in view of U.S. Pat. No. 7,016,595 to Ishino et al. ("Ishino"). This rejection traversed.

Claims 11 and 13 respectively depend from independent claim 1 and thus incorporate the features recited therein. As discussed above, Niikawa does not disclose or suggest these claimed features.

Ishino is apparently relied upon for disclosing an audio recorder/playback feature, and does not remedy the deficiencies of Niikawa. At best, Ishino appears to disclose an image storage device 4 that may be connected to a television set 1. This connection appears to provide a mechanism for allowing the television set to be used to browse images, and to allow control of external devices through the television set. There is no disclosure of a portable memory device having a display capability of any kind, nor is there any disclosure of corresponding features related to storage of content including an image, or display of such an image on the portable memory device. Ishino thus quite clearly also fails to disclose or suggest "*detaching the portable memory device from the recorder/playback device*" and "*displaying the image on the portable memory device while the portable memory device is detached from the recorder/playback device,*" as claimed by Applicant.

Accordingly, Applicant respectfully requests reconsideration and withdrawal of the rejection of the claims under 35 U.S.C. § 103(a) as being unpatentable over Niikawa in view of Ishino.

For the foregoing reasons, reconsideration and allowance of the claims which remain in this application are solicited. If any further issues remain, the Examiner is invited to telephone the undersigned to resolve them.

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Respectfully submitted,

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